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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RICK ALLEN, an Individual,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT, a
Political Subdivision of the State of Nevada;
MARILYN DELMONT, an Individual;
DAVID ROSARIO, an Individual,

Defendants.

CASE NO: 2:24-cv-00741-GMN-MDC

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES
(Second Request)**

COMES NOW, Plaintiff RICK ALLEN (hereinafter "Plaintiff"), by and through his counsel, Trevor J. Hatfield, of Hatfield & Associates, Ltd., and Defendants CLARK COUNTY SCHOOL DISTRICT, MARILYN DELMONT, and DAVID ROSARIO (hereinafter Defendants"), by and through their counsel, Karen Kao, Esq., LITTLER MENDELSON, P.C. and Betty Foley Esq., Clark County School District Office of the General Counsel, and do hereby stipulate and request that all deadlines set forth in the Stipulation and Order to Extend Discovery Deadlines (First Request) (ECF No. 21) pursuant to FRCP 26(f)(3) and LR II, 26-1 be extended by thirty (30) days. The current discovery cut-off date is May 5, 2025. This request is submitted pursuant to LR IA 6-1, LR IA 6-2, and LR II 26-4 for the reasons provided below. This is the parties' first request for an extension of discovery and dispositive motion deadline.

1 **1. DISCOVERY COMPLETED TO DATE:**

2 A. The parties have made their initial disclosures pursuant to FRCP 26(a)(1);

3 B. Defendant served discovery in the form of Interrogatories and Requests for
4 Production of Documents.

5 C. Plaintiff served Defendants' First and Second Supplemental Disclosures.

6 **2. DISCOVERY YET TO BE COMPLETED:**

7 A. Plaintiff intends to take depositions of Defendants' Persons Most Knowledgeable
8 and individual Defendants.

9 B. Plaintiff intends to propound written discovery to Defendants.

10 C. Plaintiff intends to disclose expert witnesses.

11 D. Plaintiff is compiling additional documents to supplement.

12 E. Defendants may wish to propound additional written discovery to Plaintiff.

13 F. Defendants may wish to disclose expert witnesses.

14 G. Defendants may wish to take the deposition of Plaintiff.

15 H. Parties may wish to disclose rebuttal experts.

16 **3. WHY DISCOVERY WAS NOT COMPLETED WITHIN THE LIMITS**

17 **SET BY THE DISCOVERY ORDER**

18 Counsel for the parties are working together, but both believe that it is necessary to have
19 more time to complete all discovery due to the complexity of the case. Plaintiff's experts need
20 additional time to complete their reports. Parties agree that 30 days should be sufficient.

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1 **4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY AND**
 2 **FILING DISPOSITIVE MOTIONS:**

3 All discovery in this case will be conducted in accordance with the Federal Rules of Civil
 4 Procedure and applicable Local Rules of this District Court. On December 6, 2024, this Court
 5 Ordered that the last date to disclose expert witnesses would be March 6, 2025; that the last date
 6 to disclose rebuttal experts would be January 6, 2025; that the last date to complete discovery
 7 would be April 7, 2025; that the last day to file dispositive motions would be June 4, 2025; and
 8 that the last day to file a pretrial order would be July 7, 2025. The parties propose to the Court
 9 the following cut-off dates:
 10 the following cut-off dates:

11 **A. Discovery Cut-off Date:** The discovery deadline shall be **Wednesday, June**
 12 **4, 2025.**

13 **B. Expert Disclosures:** The expert disclosure deadline shall be **Monday, April 7,**
 14 **2025,** as Saturday, April 5, 2025 is a Saturday, which is sixty (60) days prior to the discovery
 15 cut-off date of June 4, 2025, in accordance with LR 26-1(b)(3). Rebuttal expert disclosures shall
 16 be made by **Wednesday, May 7, 2025,** thirty (30) days after the initial disclosure of experts
 17 deadline, in accordance with LR 26-1(b)(3). The parties shall have until the discovery cut-off
 18 date to take the deposition of the experts. Expert discovery will be conducted in accordance with
 19 applicable Federal Rules of Civil Procedure and Local Rules of this District Court, specifically,
 20 Fed. R. Civ. P. 26(a)(2) and 26(b)(4), and Local Rules 26-1(b)(3).
 21 **C. Dispositive Motions:** Dispositive motions shall be filed by **Monday, July 7,**
 22 **2025,** as Friday July 4, 2025, is thirty (30) days after the discovery cut-off date of June 4, 2025,
 23 in accordance with LR 26-3.

24 **D. Joint Pretrial Order:** The Pretrial Order shall be filed no later than **Wednesday,**
 25 **August 6, 2025,** thirty (30) days after the deadline for filing dispositive motions date of July 7,
 26 in accordance with LR 26-3.
 27 **D. Joint Pretrial Order:** The Pretrial Order shall be filed no later than **Wednesday,**
 28 **August 6, 2025,** thirty (30) days after the deadline for filing dispositive motions date of July 7,

1 2025, in accordance with LR 26-1(b)(5). In the event dispositive motions have been filed, the
2 Pretrial Order shall be suspended until thirty (30) days after a decision of the dispositive motions
3 or further order of the Court.

4 **E. Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
5 26(a)(3), and any objections thereto, shall be included in the final pretrial order.

6 **F. Extensions or Modifications of the Discovery Plan and Scheduling Order:** In
7 accordance with LR 26-4, any motion or stipulation to extend a deadline set forth in this
8 discovery plan and scheduling order shall be received by the Court no later than twenty-one (21)
9 days before the expiration of the subject deadline. A request made within twenty-one (21) days
10 of the subject deadline will be supported by a showing of good cause. Any stipulation or motion
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1 will comply fully with LR 26-4.
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3 Dated: March 5, 2025

4 HATFIELD & ASSOCIATES, LTD.

5 */s/ Trevor J. Hatfield*
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13 *Attorneys for Plaintiff*

Dated: March 5, 2025

LITTLER MENDELSON, P.C.

/s/Karen Kao

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Attorneys for Defendants

16 **IT IS SO ORDERED:**

17 Dated 3-10-25.
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20 UNITED STATES MAGISTRATE JUDGE
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22 Respectfully submitted:
23 Dated: March 5, 2025

24 **HATFIELD & ASSOCIATES, LTD.**

25 By: */s/ Trevor J. Hatfield*

26 Trevor J. Hatfield, Esq. (SBN 7373)
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that on the 5th day of March, 2025, I electronically filed the foregoing
**STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (SECOND
REQUEST)** with the Clerk of the Court using the ECF system which served the parties hereto
electronically.

Dated this 5th day of March, 2025.

By /s/ Freda P. Brazier
An employee of Hatfield & Associates, Ltd.

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